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MEMO ENDORSED

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October 13, 2022

VIA ECF

Judge Katherine Polk Failla
United States District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Molecular Dynamics Ltd. et al. v. Spectrum Dynamics Medical Limited et al.*,
No. 1:22-cv-5167 (KPF)

Dear Judge Failla:

I write on behalf of Petitioners Molecular Dynamics Ltd., SDBM Limited, and Chauncey Capital Corp. (“Petitioners”). Pursuant to Rule 5.2 of the Federal Rules of Civil Procedure and Your Honor’s Individual Rules of Practice No. 9, and consistent with the practice followed in connection with earlier filings in this proceeding, Petitioners respectfully request that the Court issue an order permitting the temporary filing under seal of the Reply Memorandum of Law in Further Support of Petitioners’ Motion to Vacate Arbitration Award (the “Reply Brief”), as well as the Reply Declaration of Scott M. Danner and the exhibits thereto (the “Reply Danner Declaration”).

As with the documents filed under seal as exhibits to the Declaration of Scott M. Danner, ECF No. 14; the Amended Petition to Vacate and the appended Final Award, ECF No. 28; and the Declaration of Frederick L. Whitmer and exhibits thereto, ECF No. 33, the parties will meet and confer on appropriate redactions, if any, to be applied to the Reply Brief and Reply Danner Declaration in advance of a renewed motion to file these documents with such redactions on the public docket. Temporary sealing has been granted as to each of the documents described above. *See* ECF Nos. 26, 29, 36. Respondents have confirmed that they consent to temporary sealing.

Respectfully submitted,

/s/ Scott M. Danner
Scott M. Danner

cc: Counsel of record (via ECF)

Application GRANTED. The Clerk of Court is directed to file the documents at docket numbers 41 and 42 under seal, visible to the Court and parties only. The Clerk of Court is further directed to terminate the pending motion at docket number 40.

Dated: October 14, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE